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Attorneys for Plaintiff
WILLIAM AVILES HARDWOOD FLOORS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

WILLIAM AVILES HARDWOOD FLOORS,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

JTEKT CORPORATION, KOYO
CORPORATION OF U.S.A., NACHI-
FUJIKOSHI CORP., NACHI AMERICA INC.,
NSK LTD., NSK AMERICAS, INC.,
SCHAEFFLER AG, SCHAEFFLER GROUP
USA INC., AB SKF, SKF USA, INC., NTN
CORPORATION, and NTN USA
CORPORATION,

Defendants.

Case No. 5:14-cv-00114-BLF

**DECLARATION OF VICTORIA
ROMANENKO IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE CERTAIN
PORTIONS OF ITS AMENDED
COMPLAINT UNDER SEAL
PURSUANT TO LR 79-5**

Date: No Hearing Per L.R. 7-11
Time: N/A
Courtroom: 3
Judge: Hon. Beth Labson Freeman

Complaint Filed: January 8, 2014

I, Victoria Romanenko, declare as follows:

1. I am an attorney with the law firm of Cuneo Gilbert & LaDuca, LLP, counsel for Plaintiff William Aviles Hardwood Floors in the above-captioned action currently pending in the

1 U.S. District Court for the Northern District of California. I submit this declaration in support of
2 Plaintiff's motion for leave of Court to file certain documents under seal.

3 2. The portions of the Amended Class Action and Representative Action Complaint
4 that Plaintiff seeks permission to file under seal address highly sensitive and highly confidential
5 non-public business information, personal information and information relating to government
6 investigations.

7 3. Plaintiff requests to file under seal the following paragraphs contained in the
8 Amended Class Action And Representative Action Complaint: paragraphs 92 and 94-99.

9 4. The information contained in paragraphs 92 and 94-99 addresses highly
10 confidential and highly sensitive information that is not publicly available. Public disclosure of
11 this information could cause irreparable harm. For these reasons, Plaintiff requests the Court seal
12 the identified portions of the Amended Class Action And Representative Action Complaint from
13 the public record.

14 I declare under penalty of perjury under laws of the United States of America the
15 foregoing is true and correct. Executed on this 8th day of July, 2014, at Washington, District of
16 Columbia.

17
18
19 /s/ Victoria Romanenko
20 Victoria Romanenko
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CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2014, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail address registered in the CM/ECF system, as denoted on the Electronic Mail Notice List.

/s/ Jonathan W. Cuneo
Jonathan W. Cuneo